

STATE OF SOUTH CAROLINA	)	IN THE COURT OF COMMON PLEAS
	)	FIRST JUDICIAL CIRCUIT
COUNTY OF DORCHESTER	)	CASE NO.: 2022-DR-_____
	)	
ALISA KENTRUS	)	
	)	
Plaintiff,	)	<b>SUMMONS</b>
	)	
v.	)	
	)	
SOUTH CAROLINA FARM BUREAU,	)	
MUTUAL INSURANCE COMPANY	)	
Defendant.	)	
_____	)	

**TO: DEFENDANT ABOVE-NAMED, SOUTH CAROLINA FARM BUREAU MUTUAL INSURANCE COMPANY:**

**YOU ARE HEREBY SUMMONED** and required to answer the Complaint in this action, a copy of which is herewith served upon you, and to serve a copy of your Answer to the said Complaint on your subscriber, Reagan Singletary, Esquire of The Singletary Group, 327 Great North Road, Columbia, South Carolina 29223, within thirty (30) days after the service hereof, exclusive of the day of such service, and if you fail to answer the Complaint within the time aforesaid, judgment by default will be rendered against you for the relief demanded in the Complaint and the Plaintiff will be awarded said relief.

THE SINGLETARY GROUP, LLC

s/Reagan Singletary

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September 27, 2022

Columbia, South Carolina

STATE OF SOUTH CAROLINA	)	IN THE COURT OF COMMON PLEAS
	)	FIRST JUDICIAL CIRCUIT
COUNTY OF DORCHESTER	)	CASE NO.: 2022-DR-_____
	)	
ALISA KENTRUS,	)	
	)	
Plaintiff,	)	<b>COMPLAINT</b>
	)	
v.	)	
	)	
SOUTH CAROLINA FARM BUREAU	)	
MUTUAL INSURANCE COMPANY	)	
	)	
Defendant.	)	
_____	)	

The Plaintiff, Alisa Kentrus, complaining of the above-named Defendant and would respectfully show unto this Honorable Court:

1. That the Plaintiff is a citizen and resident of Berkeley County, Monks Corner, South Carolina.
  
2. That upon information and belief, Defendant South Carolina Farm Bureau Mutual Insurance Company (hereinafter "Farm Bureau") is a South Carolina Corporation. It may be served with process through service upon its designated agent through the South Carolina Insurance Commission. All the actions alleged in this Complaint occurred in Summerville, South Carolina.
  
3. That upon information and belief Defendant Timothy Cardwell is an employee of Defendant Farm Bureau. While he is classified by Farm Bureau as an independent contractor, the Plaintiff believes that he was an employee/agent of Farm Bureau at the time of the allegations alleged herein. By way of example, Defendant Timothy Cardwell is supervised and given yearly performance reviews by Scott Hill, a Farm Bureau employee. Mr. Cardwell uses equipment owned by Farm Bureau (e.g., its office, letterhead, copy paper, copiers, desks, and chairs) to sell insurance under the umbrella of Farm Bureau. He receives insurance payments from Farm Bureau members at the Farm Bureau Insurance office, Summerville, South Carolina location. Further, Farm Bureau provides rules, regulations and methods under which Mr. Cardwell would deal with his customers and Mr. Cardwell makes no distinction when advertising that he is operating as Timothy Cardwell, LLC. In addition, Farm Bureau exercises control over Mr. Cardwell by requiring him to attend Farm Bureau training and office meetings as mediated. Lastly, the SC Farm Bureau Federation pays Mr. Cardwell a portion of its county office membership fees to offset a portion of Ms. Kentrus' salary. Therefore, the Plaintiff contends that Mr. Cardwell is an agent/employee of Farm Bureau.
  
4. That the incident and allegations alleged herein occurred in Dorchester County, Summerville, South Carolina.

5. That by way of background, the Plaintiff was a Secretary/CSR with the Farm Bureau Office located in Summerville, South Carolina from December 2006, until she was terminated from employment by her supervisor, Tim Cardwell on July 8, 2020. At all times prior to the termination of her employment, the Plaintiff had favorable reviews from the Defendant.

6. Other female co-workers were also experiencing harassment by other male employees at Farm Bureau, and the company was aware of it. However, no action was taken by the Defendant to end the harassment despite Farm Bureau's written policy prohibiting any form of harassment directed toward or committed against any agency managers, employees, or staff agents, or agency managers, company employees, vendors or customers."

7. That from September 2019 to July 2020 the Plaintiff experienced ongoing harassment from, Eddie Jordan, a colleague/sales agent at the Farm Bureau Insurance Office, Summerville location. By way of example, on multiple occasions, Eddie Jordan would call the Plaintiff and other female employees at Farm Bureau names like "sweetheart," "dear", and "honey." He also bullies, yells, and screams at them and the Plaintiff. The Plaintiff reported Eddie Jordan's behavior to her supervisor, Tim Cardwell because it was harassing, disrespectful, demeaning, and she wanted it to stop. Tim has in fact admitted to the Plaintiff that Eddie Jordan is abrasive and has a temper. Nevertheless, despite her complaints, the harassment continued. Even the Plaintiff's supervisor, Timothy Cardwell, engaged in harassing and inappropriate behavior as once bragged to the Plaintiff about looking under another female's skirt while at work. Despite the harassment against women, and the Defendant being aware of it, and having policies against it, no steps were taken by the Defendant to stop it.

8. Instead of addressing the Plaintiff's repeated and continuous concerns of harassment, Mr. Cardwell terminated the Plaintiff's employment because she continuously reported the harassing behavior.

9. As a result of the Defendant's acts and omissions, Plaintiff suffered damages including compensatory, actual, punitive, front pay, back pay, and mental anguish.

**For a First Cause of Action of Violation**  
**The Americans with Disabilities Act of 1990**

10. Plaintiff restates and realleges every allegation stated herein above as if repeated verbatim herein.

11. The Plaintiff opposed the unlawful employment practice of her colleague, Eddie Jordan by objecting to his demeaning, disrespectful, and intolerable behavior by reporting such conduct to her supervisor, Timothy Cardwell. The harassment was so severe and pervasive that it created a hostile work environment. Other employees also opposed the unlawful behavior by reporting it to their supervisors and other agents of Farm Bureau, but Farm Bureau did nothing to stop the harassment despite the Plaintiff's complaints. The Plaintiff continuously reported the harassing behavior to her supervisor, Timothy Cardwell, but he terminated her employment after she reported Eddie Jordan's behavior.

12. Other women at Farm Bureau have also been harassed by men within the company, yet nothing was done by Farm Bureau to stop this practice.

13. The Plaintiff's supervisor, Timothy Cardwell was acting within the scope of his employment when he retaliated against the Plaintiff by terminating her employment after the Plaintiff reported Mr. Jordan's unlawful conduct to him.

14. The Defendant's discriminatory practices have caused the Plaintiff harm including loss of income and severe emotional distress.

15. Accordingly, the Defendant has violated the Plaintiff's rights protected under Title VII.

**For a Third Cause of Action**  
**Wrongful Termination**

16. Plaintiff restates and realleges every allegation stated herein above as if repeated verbatim herein.

17. The Defendant terminated the Plaintiff's employment because she reported the harassment she was experiencing from Eddie Jordan, a male co-worker after reporting it to her immediate supervisor on multiple occasions which was in violation of public policy and constitutes Wrongful Termination.

WHEREFORE, Plaintiff prays for judgment against the Defendant for actual damages lost wages, mental anguish, consequential, and punitive damages for the costs of this action, and for such other and further relief the Court may deem just and proper.

Respectfully Submitted,

s/Reagan Singletary  
Reagan Singletary, Esquire (Fed I.D.#10640)  
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